

# Exhibit B

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8 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,  
ROBERT VACCARI, and JAKE ADAMS

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11  
12 L.C., a minor by and through her  
13 guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
14 to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
15 Hernandez, individually and as  
successor-in-interest to Hector Puga;  
16 A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
17 individually and as successor-in-interest  
to Hector Puga; and ANTONIA  
18 SALAS UBÁLDO, individually,

19 Plaintiffs,

20 vs.

21 STATE OF CALIFORNIA; COUNTY  
22 OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISIAH KEE;  
23 MICHAEL BLACKWOOD;  
24 BERNARDO RUBALCAVA;  
25 ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

26 Defendants.  
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CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:  
Hon. Kenly K. Kato – Courtroom 1*

**COUNTY DEFENDANTS' INITIAL  
RULE 26 EXPERT DISCLOSURES**

*Trial Date: June 2, 2025*

*Complaint filed: 06/07/22*

*FAC filed: 10/18/22*

*SAC filed: 01/13/23*

*TAC filed: 05/12/23*

CASE NO. 5:23-cv-00257-KK-(SHKx)

*Trial: July 28, 2025*

*Complaint filed: 02/16/23*

*FAC filed: 06/08/23*

JONATHAN WAYNE BOTTEN, SR.;  
TANJA DUDEK-BOTTEN;  
ANNABELLE BOTTEN; and J.B., a  
minor by and through his guardian  
JONATHAN WAYNE BOTTEN, SR.,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; ISAIAH  
KEE; MICHAEL BLACWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 1-10 inclusive,

Defendants.

**TO ALL PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF  
RECORD HEREIN:**

**PLEASE TAKE NOTICE** that Defendants County of San Bernardino,  
Robert Vaccari and Jake Adams (collectively “County Defendants”), hereby  
designate their expert witnesses pursuant to Federal Rules of Civil Procedure, Rule  
26(a)(2), as follows:

1. Lucien C. “Luke” Haag  
Criminalist/Firearms Examiner  
PO Box 5347  
Carefree, AZ 85377  
(480) 488-4445

The report, curriculum vitae, case list, and fee schedule of Mr. Luke Haag are  
attached hereto as Exhibit “A.”

Mr. Haag is an expert in the field of criminalistics and forensic firearms  
examination, who, at the time of trial, will testify as to actions of defendants  
including San Bernardino County Sheriff’s Department Deputy Jake Adams

1 regarding the ballistic evidence of his discharged firearm during the shooting  
2 incident involving Hector Puga, ballistic trajectories, and such other testimony as  
3 may be relevant, which may depend on the testimony provided by Plaintiffs and/or  
4 their experts.

5       2.     Kenneth L. Hubbs  
6             Pro Tac Int'l Training and Consulting  
7             40335 Winchester Rd. Ste #E130  
8             Temecula, CA 92591  
9             (619) 322-8523

10       The report, curriculum vitae, case list, and fee schedule of Mr. Kenneth  
11 Hubbs are attached hereto as Exhibit "B."

12       Mr. Hubbs is an expert in the field of law enforcement and police practices,  
13 who, at the time of trial, will testify as to the actions of defendants including San  
14 Bernardino County Sheriff's Department Deputy Jake Adams and Sergeant Robert  
15 Vaccari, regarding their actions during the shooting incident involving Hector Puga,  
16 and such other testimony as may be relevant, which may depend on the testimony  
17 provided by Plaintiffs and/or their experts.

18       3.     Alexander Jason  
19             Senior Crime Scene Analyst and Force Science Analyst  
20             PO Box 375  
21             Pinhole, CA 94564  
22             (510) 724-1003

23       The report, curriculum vitae, case list, and fee schedule of Mr. Alexander  
24 Jason are attached hereto as Exhibit "C."

25       Mr. Jason is an expert in the field of crime scene reconstruction and force  
26 science analysis who, at the time of trial, will testify as to the actions of defendants  
27 including San Bernardino County Sheriff's Department Deputy Jake Adams and  
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1 Sergeant Robert Vaccari regarding his actions during the shooting incident  
2 involving Hector Puga, and such other testimony as may be relevant, which may  
3 depend on the testimony provided by Plaintiffs and/or their experts.

4 4. Kris Mohandie PH.D., ABPP  
5 Forensic Psychologist  
6 PO Box 88  
7 Pasadena, CA 91102-0088  
8 (626) 627-8388

9 The report, curriculum vitae, case list, and fee schedule of Dr. Kris Mohandie  
10 are attached hereto as Exhibit “D.”

11 Dr. Mohandie is an expert in the field of forensic psychology who, at the time  
12 of trial, will testify as to the conduct of Mr. Puga, the psychology of “suicide by  
13 cop,” and its applicability to Mr. Puga and this case, and such other testimony as  
14 may be relevant, which may depend on the testimony provided by Plaintiffs and/or  
15 their experts.

16 5. Richard Franklin Clark, Jr., M.D., FACEP, FACMT  
17 Department of Emergency Medicine  
18 UCSD Medical Center  
19 200 W. Arbor Drive  
20 San Diego, CA 92103-8676  
21 (619) 543-6835  
22 1148 Dreamcatcher Bluff  
23 Mesquite, NV 89034  
24 (909) 720-0961

25 The report, curriculum vitae, case list, and fee schedule of Dr. Richard Clark  
26 are attached hereto as Exhibit “E.”

27 Dr. Clark is a board-certified Medical Toxicologist and Emergency Physician,  
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1 specifically his experience is in the practice of Emergency Medicine and Medical  
2 Toxicology, including the intoxication or toxicity from the use or abuse of alcohol  
3 and amphetamines. Dr. Clark will testify regarding the level of alcohol and  
4 amphetamines found in Hector Puga at the time of his death, as well as signs,  
5 symptoms, and behavior associated with alcohol and amphetamines use and abuse,  
6 including that of Hector Puga's, and such other testimony as may be relevant, which  
7 may depend on the testimony provided by Plaintiffs and/or their experts.

8         6.       Joshua Peter Visco, Esq.  
9                 Law Offices of Visco & Selyem, APC  
10                150 El Camino Real, Suite 218  
11                Tustin, CA 92780  
12                (714) 315-7152

13         The report, curriculum vitae, case list, and fee schedule of Mr. Joshua Visco  
14 are attached hereto as Exhibit "F."

15         Mr. Visco is an expert in the field of criminal law and sentencing who, at the  
16 time of trial, will testify as to the criminal charges facing Mr. Puga at the time of  
17 incident and charges Mr. Puga would have faced if he had survived, including  
18 likelihood of sentencing ranges, and sentencing exposure, as it relates to Plaintiffs'  
19 request for damages, and such other testimony as may be relevant, which may  
20 depend on the testimony provided by Plaintiffs and/or their experts.

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Further, Defendants submit the following expert witness disclosure pursuant to *Fed. R. Civ. P.* 26(a)(2)(C). The following non-retained experts are exempt from requirements of *Fed. R. Civ. P.* 26(a)(2)(B) as they have not been retained or specially employed to provide expert opinions.

7. Timothy Jong, M.D., Forensic Pathologist  
San Bernardino County Coroner  
175 S. Lena Rd.  
San Bernardino, CA 92415  
(909) 387-2978

Dr. Timothy Jong's testimony and opinions will be limited to the autopsy he conducted and report(s) he authored and or participated in, in his capacity as a Forensic Pathologist with the County of San Bernardino and as documented in Mr. Puga's autopsy protocol and toxicology report (COSB000834-000852), and coroner investigation, as previously disclosed pursuant to *Fed. R. Civ. P.* 26(a)(1) and responses to requests for production of documents.

8. Kirk Garrison, Criminalist II  
San Bernardino County Sheriff's Department  
Scientific Investigation Division  
711 E. Rialto Avenue  
San Bernardino, CA 92415  
(909) 387-9980

Mr. Kirk Garrison's testimony and opinions will be limited to the analysis of Mr. Puga's gun, including bullets and analysis of his ballistics test firing of Mr. Puga's gun and the report and notes related to the same which he authored and/or participated in, in his capacity as a Criminalist II with the County of San Bernardino attached hereto as Exhibit "G."

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1 Defendants expressly reserve the right to call as a witness any and all experts  
2 designated by any other party.

3 Defendants expressly reserve the right to call as their own expert witnesses  
4 any additional expert witnesses needed for the purposes of rebuttal or impeachment  
5 at the time of trial.

6 Defendants reserve the right to call any other expert witness or percipient  
7 witness for the purpose of eliciting any opinions held by such witnesses and to  
8 supplement this disclosure to the extent that any party designates expert witnesses in  
9 an area not currently anticipated.

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11 DATED: January 30, 2025

**LYNBERG & WATKINS**  
A Professional Corporation

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By: /s/ Amy R. Margolies  
**SHANNON L. GUSTAFSON**  
**AMY R. MARGOLIES**  
**ANITA K. CLARKE**  
Attorneys for Defendant,  
COUNTY OF SAN BERNARDINO  
ROBERT VACCARI, and JAKE ADAMS

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